

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-  
FLW-LHG**  
**MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL CASES***

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**MOTION AND NOTICE OF MOTION OF THE PLAINTIFFS' STEERING  
COMMITTEE TO EXCLUDE THE OPINIONS OF DEFENDANTS'  
EPIDEMIOLOGY EXPERTS KARLA BALLMAN PH.D., CHRISTIAN  
MERLO, M.D., MPH, GREGORY DIETTE, M.D., MHS, AND JONATHAN  
BORAK, M.D., DABT**

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**PLEASE TAKE NOTICE**, that pursuant to Fed. R. Evid. 104(a), 403, 702, and 703, the Plaintiffs' Steering Committee ("PSC") hereby moves to exclude the opinions and testimony of Karla Ballman, Ph.D., Christian Merlo, M.D., MPH, Gregory Diette, M.D., MHS, and Jonathan Borak, M.D., DABT.

For the reasons set forth more fully in the following accompanying materials, the Court should grant the PSC's motion:

- The Plaintiffs' Steering Committee's Omnibus Brief Regarding *Daubert* Legal Standard and Scientific Principles for Assessing General Causation;
- The Plaintiffs' Steering Committee's Memorandum of Law in Support of Its Motion to Exclude the Opinions Defendants' Epidemiology Experts Karla Ballman, Ph.D., Christian Merlo,

M.D., MPH, Gregory Diette, M.D., MHS, and Jonathan Borak, M.D., DABT; and

- Certification of Counsel with attached Exhibits.

A proposed form of order is attached.

Dated: May 7, 2019

Respectfully submitted,

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